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October 25, 2021

BY ECF

The Honorable Katharine H. Parker
United States Magistrate Judge
Southern District of New York
500 Pearl Street, Room 750
New York, New York 10007

**Re: *City of Almaty, Kazakhstan, et ano. v. Felix Sater, et al.*,
Case No. 19 Civ. 2645 (AJN) (KHP)**

Dear Judge Parker:

We represent the City of Almaty, Kazakhstan and BTA Bank (the “Kazakh Entities”). We write to respectfully request that the Court accept for filing under seal Exhibits A, B, D, E, G, and H to the Declaration of Craig Wenner in Opposition to Non-Party Moses & Singer LLP’s Motion to Quash.

In accordance with the Court’s Individual Practices ¶ 4(B), the Kazakh Entities are filing the proposed sealed exhibits under seal on the Court’s ECF system. **Exhibit A** is an excerpt from the January 29, 2021 deposition of Felix Sater in this action. **Exhibit B** is an excerpt from the October 29, 2020 deposition of Bayrock Group Inc. and Global Habitat Solutions, Inc. **Exhibit D** is a Capital One Bank statement for Sands Point Partners Fund L.P. for the period of October 1, 2013 to October 31, 2013, produced in this action by Capital One Bank with Bates stamp number CONA-Almaty-00001115. Sands Point Partners Fund is an entity owned and controlled by Felix Sater. **Exhibit E** is an escrow account statement from M&S for Felix Sater, produced in this action by Felix Sater with Bates stamp number FS-002. **Exhibit G** is an email chain produced in this action. **Exhibit H** an email chain produced in this action by Felix Sater with Bates stamp number FS 02272. Each of these documents have been marked confidential by the Mr. Sater or a third-party pursuant to the protective order in this case.

Plaintiffs take no position on whether these documents are properly designated confidential under the protective order. Plaintiffs are filing the documents under seal to give Mr. Sater or Moses & Singer an opportunity to explain why these records should remain under seal. Thank you for your consideration of this request.

Respectfully,

/s/ Craig Wenner
Craig Wenner

cc: Counsel of record (via ECF)
Moses & Singer LLP (via ECF)

BOIES SCHILLER FLEXNER LLP